

Egan, Thomas Gamache, Christopher Gough, Chace Gundlach, John Kraus, Tad Kuhn, Dean Mathieson, Andrew McNally, Nancy Monbouquette, Chris Nard, Bruce Ocko and Robert Sutton (the “Witnesses”) to appear to testify before this Court, located at Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Pittsburgh, Pennsylvania 15219, on September 25, 2017.

3. The Subpoenas are procedurally deficient in the following ways: (1) the Subpoenas were not personally served upon the Witnesses in violation of Rule 45(b)(1); (2) Plaintiffs did not tender fees to the Witnesses for their attendance and mileage as required by Rule 45(b)(1); and (3) the Subpoenas require the Witnesses to travel in excess of the geographical limits set forth in Rule 45(c)(1).

4. For all of the aforementioned reasons and those set forth in the accompany Memorandum of Law, the Court should quash each of the improperly served subpoenas.

Wherefore, Defendant respectfully requests that the Court grant its Motion and quash the Subpoenas directed to Matthew Egan, Thomas Gamache, Christopher Gough, Chace Gundlach, John Kraus, Tad Kuhn, Dean Mathieson, Andrew McNally, Nancy Monbouquette, Chris Nard, Bruce Ocko and Robert Sutton.

Respectfully submitted,

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Dated: September 12, 2017

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, this 11th day of September, 2017, the foregoing Motion to Quash Trial Subpoenas was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel indicated on the electronic filing receipt. Parties may access this filing through the Court's ECF system.

/s/ Christina T. Tellado

Counsel for Defendant